Before the
**Federal Communications Commission**
Washington DC 20554

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| In the Matter of | ) | |
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| Procedures to Govern the Use of Satellite Earth Stations on Board Vessels in the 5925-6425 MHz/3700-4200 MHz Bands and 14.0-14.5 GHZ/11.7-12.2 GHz Bands | ) | IB Docket No. 02-10 |

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following brief comment in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.

APCO, founded in 1935, is the nation's oldest and largest public safety communications organization. Most of its over 16,000 members are state or local government employees who manage and operate communications systems for police, fire, emergency medical and other public safety agencies. Many of those systems includes private operational fixed microwave links the in the 6 GHz frequency band.

APCO is a member of the Fixed Wireless Communications Coalition ("FWCC") and fully supports its comments in this proceeding. APCO takes this opportunity to emphasize the critical importance of public safety microwave operations, and the need to protect those operations from any potential for interference from Earth Stations on Board Vessels ("ESVs") or other sources.

Thousands of public safety agencies across the nation use fixed microwave facilities to link key locations. Microwave is often used to provide the "backbone" for wide-area public safety mobile radio systems, by linking together multiple transmitter sites that may cover entire cities, counties, or even states. Wide area mobile radio systems of this nature are expanding to address multi-jurisdictional interoperability requirements, and to provide more cost-efficient and spectrum-efficient communications capability.[1] Microwave is the preferred method for providing infrastructure for such multi-site radio systems, as it is far more reliable than alternatives such a fiber optic cable, and far more cost-effective to install and maintain. Indeed, transmitter sites are often in remote locations (*e.g.*, mountain tops) where wired communication is unavailable at any cost.

APCO is deeply concerned with the issues in this proceeding, as many public safety microwave facilities are located near coastal and port areas where ESVs would operate. These port areas are now subject to heightened public safety concern, due to post-9/11 homeland security issues. Any interference to public safety microwave systems in these or other areas could cause dangerous disruption to police, fire, emergency medical and other essential operations.

[1] The new 700 MHz band public safety spectrum allocation is expected to be used primarily for wide-area radio systems, greatly increasing the demand for microwave links to provide necessary 'backbone."

Therefore, for the reasons discussed above, APCO supports the comments of FWCC and urges the Commission not to authorize ESV operations that could interfere with public safety communications.

Respectfully submitted,

ASSOCIAITON OF PUBLIC-SAFETY
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February 23, 2004